

EXHIBIT G

STATE OF WEST VIRGINIA)
)
COUNTY OF KANAWHA)

UNSWORN DECLARATION

I, William Ross, hereby make this Unsworn Declaration pursuant to 28 U.S.C. § 1746, under penalty of perjury, and state as follows:

I am a plastic surgeon. I was Dr. Irani's chief surgical resident during his time at Palmetto Health/USC. In this role I had the chance to directly oversee him for a couple months on daily rounds, in the operating room, and in the emergency room. Additionally, I worked with him closely for several more months when he was on the orthopaedic service and I served as the consulting physician on call. My role was to be his mentor, evaluator, and teacher. As a chief resident, I worked daily with junior residents such as Dr. Irani and served as senior resident to many residents, including several other junior orthopaedic residents at the Palmetto Health/USC program.

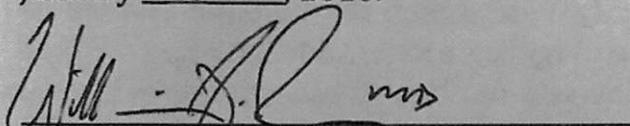
During my time working with Dr. Irani, I observed him to be an intelligent and diligent resident. I perceived him to be appropriately advanced and mature as junior resident.

When I evaluate residents, I always try to incorporate some constructive criticism as a guide for learning. In Dr. Irani's case, I perceived that his style and approach were somewhat different than most residents I encountered, partly due to the cultural differences between South Carolina and Dr. Irani's home in Northern California. I pointed out to Dr. Irani that while I thought him to be a good resident, some might perceive his approach as being laid back or disengaged. While Dr. Irani's approach actually was beneficial and ultimately helpful in order to carry out appropriate care, I did mention to him the importance of nonverbal communication and cultural competency. He understood these challenges and seemed to have the insight and self-discipline to adapt accordingly.

To emphasize, my evaluation of Dr. Irani was not an indictment but rather to be perceived as helpful feedback. There is always latitude for improvement, and my role as a senior resident was to provide constructive criticism of residents. In my observation, Dr. Irani was performing at or above his level of training. I was not asked to comment regarding my evaluation during previous proceedings. If I had been asked, I would have suggested that I had no reservations about his clinical competency or ability to practice medicine, but that I simply felt that Dr. Irani could benefit from a greater awareness of effective communication styles. After reviewing the evaluation, I do not perceive it to be negative in its assessment. Its form would be in keeping with an average evaluation.

I have heard that there were complaints made against Dr. Irani from members of nursing. I do not have any personal knowledge of these. In my experiences with Dr. Irani, I can only say that he treated all of the nursing and support staff respectfully and was professional in his interactions with them. It would be exceedingly unusual for an Orthopedic resident to navigate his training without some complaints. The rigors of training and stressors of caring for patients can strain communication at times. I certainly did not feel that his behavior towards others was anything but appropriate.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
January 25, 2016.


William Ross MD